

Debtor 1 Phillip L. Blair

Debtor 2 Rhonda S. Blair
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of Pennsylvania
(State)

Case number 18-10438-JCM

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: NewRez LLC d/b/a Shellpoint Mortgage Servicing

Court claim no. (if known):
12

Last 4 digits of any number you use to identify the debtor's account: 2 4 6 1

Property address: 518 Bessemer Ave
Number Street

Grove City, Pennsylvania 16127
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 08 / 01 / 2023
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

 / /
MM / DD / YYYY

Debtor 1 Phillip L. Blair Case number (if known) 18-10438-JCM
First Name Middle Name Last Name

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Kaitlin D. Shire
Signature

Date 09 / 19 / 2023

Print Kaitlin D. Shire
First Name Middle Name Last Name

Title Creditor's Counsel

Company Hill Wallack LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 777 Township Line Road, Suite 250
Number Street

Yardley, PA 19067
City State ZIP Code

Contact phone (215) 579 - 7700

Email kshire@hillwallack.com

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
(ERIE)**

IN RE:

**Phillip L. Blair and Rhonda S. Blair
Debtor**

NewRez LLC d/b/a Shellpoint Mortgage Servicing

Movant

v.

**Phillip L. Blair and Rhonda S. Blair
Respondent**

CHAPTER 13

CASE NO.: 18-10438-JCM

CERTIFICATE OF SERVICE

I hereby certify that service was made upon all interested parties indicated below of (i) Response to Notice of Final Cure of NewRez LLC d/b/a Shellpoint Mortgage Servicing:

Date Served (ECF) or Mailed: September 19, 2023

Phillip L. Blair
518 Bessemer Avenue
Grove City, PA 16127

Debtors

Via Regular Mail

Rhonda S. Blair
518 Bessemer Avenue
Grove City, PA 16127

Debtors

Via Regular Mail

Daniel P. Foster
Foster Law Offices
1210 Park Avenue
Meadville, PA 16335

Debtor's Counsel

Via ECF

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
Chapter 13 Trustee
Via ECF

U.S. Trustee
Office of the United States Trustee
Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222
U.S. Trustee
Via ECF

/s/ Kaitlin D. Shire
Kaitlin D. Shire, Esq., Atty ID 324226
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